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Attorneys for Defendant and Counterclaimant
TWIN CITY FIRE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CROWLEY MARITIME CORPORATION,)	Case No. CV-08-00830 SI
)	
Plaintiff,)	[Hon. Susan Illston]
)	
vs.)	STIPULATION TO VACATE CASE
)	MANAGEMENT CONFERENCE;
FEDERAL INSURANCE COMPANY; TWIN)	[PROPOSED] ORDER
CITY FIRE INSURANCE COMPANY; RLI)	
INSURANCE COMPANY; and DOES 1-20,)	(CIVIL L.R. 6-1(b), 6-2, 7-12, 16-2(e))
inclusive,)	
)	Date: November 14, 2008
Defendants.)	Time: 9:00 a.m.
)	Ctrm: 10
)	
)	[Declaration of Richard R. Johnson filed
)	concurrently herewith]
)	
)	
)	

STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER –
Case No. 08-0830 SI

Pursuant to Civil Local Rules 6-1(b), 6-2, 7-12, and 16-2(e), Plaintiff Crowley Maritime Corporation (“Crowley”) and Defendants Federal Insurance Company (“Federal”), Twin City Fire Insurance Company (“Twin City”), and RLI Insurance Company (“RLI”), (collectively, the “Parties”) hereby offer this Stipulation to Vacate the Case Management Conference in this action, supported by the concurrently-filed Declaration of Richard R. Johnson (“Johnson Decl.”) and [Proposed] Order.

A Case Management Conference is currently scheduled for November 7, 2008, at 2:30 p.m.. In light of the Parties’ four pending motions for summary judgment, which are scheduled to be heard on November 14, 2008 at 9:00 a.m., all Parties agree that, due to the significance of those motions to the case, the current CMC should be vacated. Thus, for purposes of judicial economy and for the convenience of the Court and the Parties, the Parties respectfully request that this Court enter an Order vacating the November 7, 2008 Case Management Conference pending this Court’s ruling on the pending summary judgment motions.

Respectfully submitted,

Dated: October 27, 2008

PILLSBURY & LEVINSON, LLP
COVINGTON & BURLING LLP

By: */s/ Michael S. Greenberg*
G.O. 45.X.B. authorization obtained

MICHAEL S. GREENBERG
Attorney for Plaintiff
Crowley Maritime Corporation

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1 Dated: October 27, 2008

RUDLOFF WOOD & BARROWS LLP
HOGAN & HARTSON LLP

3 By: /s/ Stephen A. Loney
4 G.O. 45.X.B. authorization obtained
5 STEPHEN A. LONEY
6 Attorneys for Defendant Federal Insurance
7 Company

7 Dated: October 27, 2008

STROOCK & STROOCK & LAVAN LLP

8 By: /s/ Richard R. Johnson
9 RICHARD R. JOHNSON
10 Attorneys for Defendant Twin City Fire
11 Insurance Company

11 Dated: October 27, 2008

MORISON ANSA HOLDEN ASSUNCAO
& PROUGH, LLP

13 By: /s/ Brian E. Sims
14 G.O. 45.X.B. authorization obtained
15 BRIAN E. SIMS
16 Attorneys for Defendant RLI Insurance
17 Company

15 The case management conference
16 has been continued to 12/12/08 @
17 2:30 p.m.

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.



21 Dated: _____

Hon. Susan Illston

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss

I am employed in the County of Los Angeles, State of California, over the age of eighteen years, and not a party to the within action. My business address is: 2029 Century Park East, Suite 1800, Los Angeles, California 90067-3086.

On October 27, 2008, I served the foregoing document(s) described as: **STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER** on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

William Campbell Morison-Knox, Esq.
 Morison Ansa Holden Assuncao & Prough, LLP
 1550 Parkside Dr., Third Floor
 Walnut Creek, California 94596-8068

(X) **(VIA U.S. MAIL)** In accordance with the regular mailing collection and processing practices of this office, with which I am readily familiar, by means of which mail is deposited with the United States Postal Service at Los Angeles, California that same day in the ordinary course of business, I deposited such sealed envelopes, with postage thereon fully prepaid, for collection and mailing on this same date following ordinary business practices, addressed as set forth below.

() **(VIA FACSIMILE)** By causing such document to be delivered to the office of the addressee via facsimile.

() **(VIA OVERNIGHT DELIVERY)** By causing such envelope to be delivered to the office of the addressee(s) at the address(es) set forth above by overnight delivery via Federal Express or by a similar overnight delivery service.

I declare that I am employed in the office of member of the bar of this court under whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 27, 2008 at Los Angeles, California.

 Linda R. Bedre
 [Type or Print Name]

 /s/ Linda R. Bedre
 [Signature]